

APPENDIX L

**ROCKAWAY DELIVERY LATERAL PROJECT
UNANTICIPATED DISCOVERY OF CONTAMINATION PLAN**



Transcontinental Gas Pipe Line Company, LLC

Procedure 35.04.01

Unanticipated Discovery of Contamination Plan

Rockaway Delivery Lateral Project

December 2012

Unanticipated Discovery of Contamination Plan

The intent of this *Unanticipated Discovery of Contamination Plan* is to outline practices to employ in the event of an unanticipated discovery of contamination in soil, groundwater, and sediment when excavating during construction and/or maintenance activities, as well as debris or waste materials deposited on the pipeline right-of-way at Williams Gas Pipeline facilities. The purposes of this plan are to:

- Protect human health and worker safety;
- Prevent the spread of contamination; and
- Comply with applicable state and/or federal regulations.

Pre-job planning

When planning a project at Williams Gas Pipeline facilities and/or along the pipeline Right-of-Way (ROW), The Chief Inspector (CI), Environmental Inspector (EI), District Manager, and/or their designee shall complete a review of the proposed pipeline and/or aboveground facility locations prior to the construction and/or maintenance activity in order to assess the potential for the presence of known or potential contamination. An assessment should also be made of the likelihood of encountering contamination during an excavation or along surface. The scope of the review and assessment will depend upon the size of the project, past experience, and available information.

For pipeline construction projects, the review and assessment will consist of a site reconnaissance of the proposed work area, interviews with property owners, and a review of any readily available information. It may also be necessary to consult with the Permits and Natural Resources and/or Environmental Compliance Departments to conduct an environmental database search (e.g., EDR search) and/or perform additional investigation. Generally, it is not anticipated that this review will identify contamination along the ROW, but it will likely identify areas where there is a higher potential for contamination.

For maintenance-related excavations at compressor and meter stations, these have a higher likelihood of encountering something unexpected due to the age of these facilities as well as the use of regulated substances at these facilities.

If it is determined that there is a high likelihood that the planned work will be conducted in close proximity to, or within, known or suspected contaminated sites, the Permits and Natural Resources and Environmental Compliance Departments should be consulted.

The results of this search/investigation will be reviewed prior to start of construction and/or maintenance activity and any identified contaminated sites and/or areas will be located and available information reviewed for potential impacts. In the event the planned work will impact a confirmed contaminated site,

the Environmental Compliance Department will work with the appropriate regulatory agency, property owner, and responsible party to ensure the construction and/or maintenance activities are conducted in accordance with applicable and established site requirements. Where feasible, a re-route or other modification to the project should be considered. Postponement of the project may also be necessary.

If contaminated sites are identified for areas of the project, a list of the sites should be kept along with how the determination was made (EDR, property owner, agency report, etc.). An example of this list is included in *Worksheet A* at the end of this document.

Unanticipated Discovery Response

In the event unanticipated contaminated soil, groundwater or other potential environmental contamination are encountered during the project (e.g., malodorous soils and/or groundwater with visible staining and/or sheen), the following general procedures will be implemented:

1. All construction and/or maintenance work in the immediate vicinity of areas where suspected contamination or unknown wastes are encountered will be halted.
2. All construction, oversight, and observing personnel will be evacuated to a road or other accessible up-wind location until the types and levels of potential contamination can be verified by qualified personnel. This assessment may include, but not be limited to: observation by a qualified health and safety professional, field screening using the appropriate air sampling devices, and/or laboratory analysis of suspect material.
3. The Chief Inspector (CI), Environmental Inspector (EI), and/or District Manager will be notified and they will consult with the company's Environmental Compliance Department. The contacts for the Environmental Compliance Department are provided at the end of this plan.
4. Following consultation with on-site personnel, the Environmental Compliance Department will be responsible for designating follow-up actions, including mobilizing emergency response personnel and coordinating with the EPA and/or state and local agencies as appropriate.
5. If an immediate or imminent threat to human health or the environment exists, the EI, CI, District Manager, and/or their designee will immediately contact the appropriate responding agency.
 - For construction projects, the contact numbers for fire, police, and the state environmental hotline can be found on the Environmental Contacts List for the project.
 - For maintenance projects, the contact numbers for fire, police, and the state environmental hotline can be found on the compressor station's Spill Plan.

6. If an immediate or imminent threat to human health or the environment does **not** exist, or has been abated, a determination will be made, after consulting with all responsible parties, for conducting any remedial action. If the company or their qualified contractor personnel are responsible for any remedial action it will be limited to the planned work area only and no additional disturbance should be made except as needed to facilitate construction and/or maintenance activities.
 - Representative samples of the suspected contaminated media (i.e., soil, water, and waste) may need to be submitted for laboratory analysis to determine waste classification and/or agency notification requirements, which can vary from state-to-state.
 - The CI, EI, District Manager, and/or their designee shall consult with the Environmental Compliance Department for the appropriate analyses, sampling methodology, and sampling frequency.
 - Any excavated soils or waste that are suspected of containing contamination above the appropriate clean-up standard, or otherwise regulated for disposal, will be placed on plastic sheeting and covered at the end of each work day or placed in an appropriate container to prevent the spread of any further contamination. Containers must be closed or covered and any storage areas cordoned off with orange safety fence. All containers should be clearly labeled with the name of the contents and any known hazard associated with the material identified on the container. Known hazardous wastes should be labeled with the words "Hazardous Waste" and the date the waste was placed in the container.
 - Water or groundwater suspected of being contaminated will **not** be discharged to grade without prior state approval. Options such as on-site storage tanks or discharge to a publicly owned treatment works should be considered. Limiting and/or diverting the flow of clean surface water away from the affected area, as well as other measures, may be implemented to minimize impacts and exposure to the work area.
7. If it is determined that the company or its qualified contractor will be responsible for arranging for disposal of any affected media (soil, water, waste), the material will be characterized and disposed of properly at a permitted facility in a timely manner. All disposal documentation should be obtained and filed in the project files and copies sent to the Environmental Compliance Group.
 - If USEPA regulated hazardous wastes, Toxic Substance Control Act wastes, or state hazardous wastes are generated, a USEPA generator identification number will need to be obtained. The Environmental Compliance Group must be contacted to assist in either obtaining a project specific ID number or providing an EPA ID number for an existing facility.

WORKSHEET A – KNOWN OR SUSPECTED CONTAMINATED SITES

Instructions: Please complete a separate sheet for each location where contamination has been noted

I. Site Name

II. Physical Location

**III. How Contamination Determination Was Determined
(Visual, Sampling, Smell, etc.)**

INTERNAL ENVIRONMENTAL ASSISTANCE CONTACT SHEET

District/Location: _____

District Manager: _____

Office: _____ Home: _____ Pager/Cell: _____

Assistant District Manager: _____

Office: _____ Home: _____ Pager/Cell: _____

DIVISION CONTACTS

PRINCETON DIVISION (PA, NJ, NY)

Mario DiCocco – Director, Operations

Office: 609-936-2401

Home: 215-968-2639

Cell: 609-658-6941

Mike Maben – Division Environmental Engineer

Office: 607-431-1180

Home: 607-432-6482

Cell: 609-865-1929

ENVIRONMENTAL COMPLIANCE AND NATURAL RESOURCES DEPARTMENTS

Mark Bisett – Manager, Environmental
Compliance

Office: 713-215-2781

Home: 281-225-9683

Cell: 713-213-2581

Mary Beth Whitfield – Air Quality Compliance

Office: 713-215-4562

Home: 281-494-1599

Cell: 713-806-5202

Tim Powell – Manager, Natural Resources

Office: 713-215-2719

Home: 281-859-1517

Cell: 713-854-1153

Craig Linn – Director, Technical Services OPS

Office: 713-215-2554

Home:

Cell: 281-513-2588

Mark Nelson – Team Leader, Operations
Support and Remediation Groups

Office: 713- 215-4563

Home: 713-622-7122

Cell: 713-822-8479

EXTERNAL NOTIFICATION LIST

Fire – _____

Police – _____

Hospital – _____

State Environmental Hotline – _____

National Response Center – _____